

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE: XARELTO (RIVAROXABAN)
(’310) PATENT LITIGATION

MDL No. 21-3017-RGA

BAYER PHARMA AG, BAYER AG and
JANSSEN PHARMACEUTICALS, INC.,

Plaintiffs,

v.

HETERO LABS LIMITED, ASCENT
PHARMACEUTICALS INC. and CAMBER
PHARMACEUTICALS, INC.,

Defendants.

C.A. No. 25-754-RGA

BAYER PHARMA AG, BAYER AG, and
JANSSEN PHARMACEUTICALS, INC.,

Plaintiffs,

v.

LUPIN LIMITED, et al.,

Defendants.

C.A. No. 21-314-RGA-LDH (consolidated)

STIPULATION AND ORDER REGARDING STAY

WHEREAS, Plaintiffs Bayer Pharma AG, Bayer AG, and Janssen Pharmaceuticals, Inc., (collectively, “Plaintiffs”) filed C.A. No. 25-754-RGA against Defendants Hetero Labs Limited, Ascent Pharmaceuticals Inc., and Camber Pharmaceuticals, Inc. (collectively “Hetero”) asserting U.S. Patent No. 10,828,310 (“the ’310 patent”); and

WHEREAS, Plaintiffs are engaged in related litigation against a number of defendants in connection with the '310 patent, which are coordinated and consolidated under MDL No. 21-3017-RGA and C.A. No. 21-314-RGA-LDH (consolidated), which is currently stayed pending the conclusion of the proceedings in *Bayer Pharma Aktiengesellschaft v. Mylan Pharms. Inc.*, No. 2023-2434 (Fed. Cir.);

NOW, THEREFORE, Plaintiffs and Hetero hereby STIPULATE, and request that the Court ORDER, as follows:

1. The Court's Orders staying the case in C.A. No. 21-314 ("Stay Orders," D.I. 144, 153) shall apply to C.A. No. 25-754-RGA.
2. The Stipulated Protective Order in C.A. No. 21-314-RGA-LDH (consolidated) (D.I. 36, 37) shall apply.

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Limited, Ascent Pharmaceuticals Inc., and
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SO ORDERED this ____ day of _____, 2025.

UNITED STATES DISTRICT JUDGE